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**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

MICHAEL RENO, ERIC KIEFABER,  
DENNIS RHOADES, JASON HARRIS,  
PREMIER TAMAYO, WILFREDO  
ALLANIGUE and ARIES BIHASA,  
Individually and on behalf of others similarly  
situated,

CASE NO.: 2:18-cv-840-APG-NJK

**STIPULATION AND ORDER  
EXTENDING DEADLINES**

Plaintiff,

vs.

WESTERN CAB COMPANY, HELEN  
TOBMAN MARTIN, MARILYN TOBMAN  
MORAN, JANIE TOBMAN MOORE,  
MARTHA SARVER and JASON AWAD,

Defendants.

Plaintiffs Michael Reno, Eric Kiefaber, Dennis Rhoades, Jason Harris, Premier Tamayo, Wilfredo Allanigue and Aries Bihasa (“Plaintiffs”) and Defendants Western Cab Company, Helen Tobman Martin, Marilyn Tobman Moran, Janie Tobman Moore, Marther Sarver and Jason Awad, (“Defendants”), through their counsel of record, hereby stipulate and agree as follows:

1. On February 23, 2024, the Court issued its Order (ECF 382) extending the remaining pre-trial scheduling deadlines in this case. That Order extended the dispositive motion deadline to April 29, 2024, and the trial brief deadline to May 27, 2024. ECF 382.

1           2. Subsequent to the Court's ECF 382 Order, the Court Ordered the defendant  
2 Western Cab to appear for a limited Rule 30(b)(6) deposition no later than March 31, 2024. ECF  
3 386. That deposition is taking place on March 28, 2024, at 2pm.

4           3. The plaintiffs assert they need time to receive the transcript of that deposition and  
5 to determine the impact of the testimony given during that deposition on any dispositive motions.  
6

7           4. Accordingly, the parties hereby stipulate and agree that the deadline for  
8 dispositive motions shall be extended by sixty (60) days and will be due on June 29, 2024, and  
9 the trial brief will be continued to July 26, 2024 or 30 days after the rendering of any decision on  
10 dispositive motions, if any such motions are filed.

11           5. This request is not made for the purpose of delay.  
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13           Dated March 28, 2024

14           Respectfully submitted,

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16           /s/ Leon Greenberg  
17           LEON GREENBERG, ESQ.  
18           LEON GREENBERG  
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24           Attorneys for Plaintiffs

13           Dated March 28, 2024

14           Respectfully submitted,

15           \_\_\_\_\_  
16           /s/ Mario Lovato  
17           MARIO P. LOVATO  
18           LOVATO LAW FIRM, P.C.  
19           Nevada Bar No. 7427  
20           7465 W. Lake Mead Blvd. Ste. 100  
21           Las Vegas, NV 89128  
22           Attorney for Defendants

23           IT IS SO ORDERED.

24           \_\_\_\_\_  
25             
26           UNITED STATES MAGISTRATE JUDGE

27           April 2nd, 2024